

**Olivia Y., Jamison J., et al. V. Phil
Bryant, Donald Taylor, et al.**

David Chandler

November 29, 2018

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

OLIVIA Y., BY AND THROUGH HER NEXT
FRIEND, JAMES D. JOHNSON; JAMISON J.,
BY AND THROUGH HIS NEXT FRIEND,
CLARA LEWIS; DESIREE, RENEE, TYSON,
AND MONIQUE P., BY AND THROUGH THEIR
NEXT FRIEND, SYLVIA FORSTER; JOHN A.,
BY AND THROUGH HIS NEXT FRIEND,
JAMES D. JOHNSON; CODY B., BY AND
THROUGH HIS NEXT FRIEND, SHARON SCOTT;
MARY, TOM, MATTHEW, AND DANA W., BY AND
THROUGH THEIR NEXT FRIEND, ZELATRA W.;
AND SAM H., BY AND THROUGH HIS NEXT
FRIEND, YVETTE BULLOCK; ON THEIR OWN
BEHALF AND BEHALF OF ALL OTHERS SIMILARLY
SITUATED

PLAINTIFFS

V. CIVIL ACTION NO. 3:04-CV-251-TSL-FKB
PHIL BRYANT, AS GOVERNOR OF THE STATE OF
MISSISSIPPI; DONALD TAYLOR, AS EXECUTIVE
DIRECTOR OF THE DEPARTMENT OF HUMAN
SERVICES; AND BILLY MANGOLD, AS DIRECTOR
OF THE DIVISION OF FAMILY AND CHILDREN'S
SERVICES

DEFENDANTS

DEPOSITION OF DAVID CHANDLER

Taken at the instance of the Plaintiffs at
Bradley, LLP 188 East Capitol Street, Suite 400
Jackson, Mississippi, on Thursday,
November 29, 2018, beginning at 10:57 a.m.

REPORTED BY:

GINGER H. BROOKS, CCR #1165
CRR, RPR, CRC, CCR, CLR, RSA

David Chandler 11/29/2018

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David Chandler 11/29/2018

1	INDEX	
2	Style and Appearances.....	1
3	Index	3
4	Certificate of Deponent	48
5	Certificate of Court Reporter	49
6	EXAMINATIONS	
7	Examination By Ms. Lowry	4
8	Examination By Ms. Rachal	44
9	EXHIBITS	
10	Exhibit 18 5/5/16 Jackson Free Press	17
11	Article	
12	Exhibit 19 3/13/18 Mississippi Today	30
13	Article	
14	Exhibit 20 5/31/18 Mississippi Today	40
15	Article	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

David Chandler 11/29/2018

1 DAVID CHANDLER,
2 having been first duly sworn, was examined and
3 testified as follows:

4 EXAMINATION BY MS. LOWRY:

5 Q. Would you state your name for the
6 record, please?

7 A. David Anthony Chandler.

8 Q. Thank you.

9 Dr. Chandler, have you ever been
10 employed by the Mississippi Department of Child
11 Protective Services?

12 A. Yes.

13 Q. And what was your position there?

14 A. I was the commissioner for Child
15 Protective Services. Commissioner, I think, was
16 my title.

17 Q. And for how long were you there?

18 A. I was there from -- let me think now,
19 December 2016 -- no, I guess December 2015 --
20 December 2015 until September 15th, 2017, I
21 believe.

22 Q. Okay. Thank you.

23 What were your goals as commissioner at
24 MDCPS?

25 A. Okay. When Governor Bryant approached

David Chandler 11/29/2018

1 me about taking the position, we were at the
2 Supreme Court at -- at an event, and he bumped me
3 on the elbow and asked me if he could talk with
4 me, and he asked me, he said, I'm making foster
5 care, I believe is what he said, a standalone
6 agency, and I want you to consider serving as the
7 head of the agency.

8 And he said there have been some
9 problems, and we're in some litigation, and I need
10 someone who can get the agency functioning the way
11 I want it to function so that we're properly
12 serving the children.

13 And so that was my objective. I would
14 not have agreed to take the position if my
15 objective had not been what he stated as his
16 objective. So my number 1 objective, it almost
17 goes without saying, my number 1 objective was to
18 first make sure that we properly identified all of
19 the children in Mississippi who were in an unsafe
20 situation at home because of either abuse or
21 neglect.

22 And then once they were properly
23 identified, see that that situation was corrected.

24 Q. And did you have goals with regard to
25 the foster care part of the program as well?

David Chandler 11/29/2018

1 A. Well, sure. It would be rather
2 counterproductive to remove a child from an
3 unhealthy, unsafe situation and not provide proper
4 foster care.

5 Q. How did your goals or priorities relate
6 to the Olivia Y. litigation?

7 A. Well, Olivia Y. was a constant factor
8 there, but it never stood in the way of our
9 primary goals, but obviously, now, Olivia Y.
10 demanded some of my attention. And what I wanted
11 to make sure that we did in relation to Olivia Y.
12 was any court order that pertained to Child
13 Protection Services, I wanted to make sure that we
14 met all of the requirements of the court order.

15 I mean, court orders are not to be taken
16 lightly, and if -- if a court orders an agency or
17 an individual to do something, then I think it's
18 in the best interest of everyone who is affected
19 by that court order to comply. And certainly, I
20 think that was certainly one of our goals.

21 Q. I'd like to ask you if you are familiar
22 with a report that was done by public -- by an
23 organization called Public Catalyst in November of
24 2015 and which has already been marked as
25 Exhibit 3. I'm sorry. I'd like to ask you this:

David Chandler 11/29/2018

1 Are you familiar with this report?

2 A. Well, you know, Marcia, let me say at
3 first glance, no. But that doesn't mean that I
4 have not seen it before. That's a lot of reading
5 there. I doubt that I've ever read that.

6 Q. Let me direct your attention to one
7 particular page --

8 A. Okay.

9 Q. -- or two pages in the report, pages 16,
10 17. If you could look at those pages, starting at
11 the bottom of page 16.

12 A. Where it says, "An effective approach to
13 work with staff..."?

14 Q. That's right. And I want to
15 specifically direct your attention to where the
16 paragraph -- in the middle of the paragraph where
17 it says, "To achieve positive outcomes for
18 children and families, it is critical that
19 Mississippi have a competent, committed, trained
20 and resourced child welfare workforce." And it
21 goes up to the top of 17, "The first order of
22 business must be the creation and implementation
23 of a comprehensive dynamic plan to achieve
24 manageable caseloads for staff within one year."

25 A. Oh, sure, I understand that, yeah.

David Chandler 11/29/2018

1 Those caseload numbers we -- we talked about
2 constantly, or, you know.

3 Q. It says --

4 A. You've taken Tracy's deposition, right?

5 Q. Yes.

6 A. You asked her this? Maybe I shouldn't
7 ask you that.

8 Let me make a bet. Do you bet?

9 Q. Sometimes.

10 A. I bet you a nickel you can ask Tracy
11 Malone what you just asked me, and she can talk
12 about it for an hour, okay?

13 Q. I think you're losing the bet.

14 Okay. But in any case, did you agree
15 with that statement?

16 A. Well, sure, yes. I mean -- and let me
17 tell you why. See, I was a novice at this,
18 really. I came from a different environment, but
19 early on, I was told -- and it was constantly
20 reinforced by everyone at CPS, I think, that
21 caseloads was the way our productivity or maybe
22 the --

23 (Off the record.)

24 THE WITNESS: But I mean, you know,
25 that's the way it was measured. I didn't

David Chandler 11/29/2018

1 know any other way, and I didn't hear anyone
2 else propose another way.

3 Q. (By Ms. Lowry) And were caseloads then
4 important to you?

5 A. Oh, absolutely, yeah. I -- I presumed
6 that was the way that the effectiveness of the
7 agency was measured.

8 Q. Let me direct your attention to the
9 recruit -- 2016 recruitment, hiring and retention
10 plan which has previously been marked as
11 Exhibit 4, which has your name on it.

12 A. Yeah.

13 Q. Okay. And are you familiar with this
14 document?

15 A. Well, I do remember seeing this before.

16 Q. Who prepared this document?

17 A. Oh, my goodness. Probably that lady --
18 I can't think of her name, but she's the -- she's
19 the -- kind of the public relations person there,
20 and she's also -- or when I was there, she was
21 Tracy's secretary.

22 Most of these data would have come from
23 Tracy and Kristi, I would say, but primarily
24 Tracy, but Tracy would have been talking with her
25 staff, you know, to compile the data.

David Chandler 11/29/2018

1 Q. And this is -- could you describe what
2 this is?

3 A. Can what?

4 Q. Can you describe what this document is?

5 A. Well, it's our plan pertaining to
6 recruitment, hiring and retention.

7 Q. And did it identify the number of
8 additional positions you needed?

9 A. It will. We probably thought it did.
10 Whether it actually did, I don't know, but I mean,
11 my name is on it, and I will say that it reflects
12 what I thought was our plan pertaining to
13 recruitment, hiring and retention. Now, I didn't
14 just make that up. I got that from Tracy, and
15 Kristi, and probably Cindy, and maybe Takesha.

16 Q. And did it set out how many additional
17 workers you needed to hire in order to comply with
18 Olivia Y.?

19 A. Well, I would -- I would say that based
20 on the title on the front that it probably does.

21 MS. RACHAL: Objection. Let me note
22 that you're basing your follow-up questions
23 on witness testimony which says probably as
24 opposed to actually.

25 THE WITNESS: Oh, I wouldn't know,

David Chandler 11/29/2018

1 actually. I'm just going by what's on the
2 title. Don't ask me to read all that and
3 tell you how relevant and -- and how accurate
4 it is. I mean, I'm too slow for that.

5 Q. (By Ms. Lowry) Do you think it's possible
6 to achieve compliance with the Olivia Y. settlement
7 agreement without increasing caseloads at MDCPS?

8 A. Without decreasing caseloads?

9 Q. Increasing caseloads?

10 A. Increasing caseloads. Wait, now,
11 what --

12 Q. I don't mean caseload standards. I mean
13 the number of workers.

14 A. Yeah, yeah. Each worker would have a
15 fewer number of children she was responsible for,
16 in her caseload.

17 Q. That's right. Exactly.

18 A. Yeah.

19 Q. And do you think that it's possible to
20 comply with Olivia Y. without complying with the
21 recruitment, hiring and retention plan?

22 A. That probably came -- I'm just guessing
23 now. Is it okay if I say probably? You know,
24 you're going to have to cut me a little slack now.
25 I've been away from this for a while, but here's

David Chandler 11/29/2018

1 what I think. Here's what -- based on that, more
2 than likely, Tracy and Kristi and Lee Ann is the
3 secretary, more than likely, they took numbers
4 from the court order and put a plan together, and
5 this is it.

6 MS. RACHAL: Same objection.

7 THE WITNESS: There again, the person --
8 even though it had my name on it, the
9 person -- the people to ask about that are --
10 is 2016, Tracy, Kristi, Cindy and Takesha.

11 Q. (By Ms. Lowry) The report provides for
12 you -- for the agency to hire a specific number of
13 additional workers.

14 A. Yes.

15 Q. In fact, it calls for 509 additional
16 workers to be hired at that time.

17 A. Okay.

18 MS. RACHAL: Object to form.

19 THE WITNESS: That was May '16.

20 Q. (By Ms. Lowry) That's correct. That's
21 correct.

22 A. Yeah. Yeah.

23 Q. Did you have meetings with counsel for
24 plaintiffs, defendants, your counsel and Public
25 Catalyst during the calendar years 2016 and '17?

David Chandler 11/29/2018

1 A. Oh, yes. We -- we met whenever you told
2 us to.

3 Q. And were the meetings focusing on
4 addressing caseload issues as well as other
5 things?

6 A. Well, other things, but caseload was a
7 huge part of it all. That was -- that kind of
8 seemed to be the driving concept behind
9 everything.

10 Q. And who generally was present at these
11 meetings?

12 A. Well, let's see, now. I'd usually sit
13 right there, Kenya would sit here, Kristi would
14 sit there, Tracy would sit next, Cindy would sit
15 next to her, Takesha would sit next to her, Seth
16 Shannon would sit down at the end. Will Simpson
17 was at a number of the meetings.

18 Q. And who is Will Simpson?

19 A. Will Simpson is our governor's office
20 liaison.

21 Q. Okay. So the governor's office was
22 represented at many of those meetings?

23 A. Well, as I recall, I would say a good
24 number.

25 Q. Okay.

David Chandler 11/29/2018

1 A. But now, you'd have to ask Will about
2 that.

3 Q. Okay.

4 A. You were always there. Sara was here.

5 Q. Thank you.

6 When the discussion was held about the
7 caseload limitations, did the governor or his
8 representative ever discuss any disagreements with
9 the caseload limitations that we were dealing
10 with?

11 A. Not that I know of, but let's put this
12 thing in perspective. The governor is probably
13 like I am. This is speculation, but I imagine he
14 can spell caseload, but that might be about all he
15 knows about it, because that was about all I knew
16 about it when I got there, and I still don't
17 understand much about it.

18 Q. Did you ever have a conversation with
19 the governor or Will Simpson about the caseload
20 limitations in the MSA?

21 A. Not the caseload limitations, no, but I
22 did talk with the governor some, and I talked with
23 Will anytime I needed to. You know, if I needed
24 to drop my car off and get the oil changed, I
25 thought I could call Will, and he'd let me ride to

David Chandler 11/29/2018

1 the office, that kind of thing, and sometimes we
2 talked about CPS stuff, too.

3 Q. Ultimately, did the governor sign off on
4 the second MSA?

5 A. It's speculation on my part, but I
6 presume if he didn't, it wouldn't be any such
7 thing.

8 Q. Did there come a time during one of
9 those meetings when I asked you whether you could
10 assure plaintiffs that there would be no problem
11 getting the necessary funds to lower caseloads as
12 provided in the resource hiring and retention
13 plan?

14 A. Well, if you say you did, I say you
15 probably did, yeah. But look, now, am I talking
16 too much? You know, the money thing, I never did
17 pay much attention to, because here's why.
18 Everyone wanted the agency to succeed, everyone,
19 and everyone that I spoke with in the State of
20 Mississippi assured me that he or she would help
21 in whatever way possible, you know, and that was
22 the -- that was the environment at the time when I
23 was there. I was confident that the folks who had
24 the money would provide it.

25 Q. Do you know that there is currently a

David Chandler 11/29/2018

1 hiring freeze in effect at the agency?

2 A. No. I guess the only way I'd know that
3 is if I applied for a job, and I haven't done
4 that. Are you -- are you saying --

5 Q. I'd like for you to take a look at
6 Exhibit 5. That is a document that basically
7 freezes hiring, and we've had some testimony about
8 that but basically --

9 MS. RACHAL: Objection,
10 characterization.

11 MS. LOWRY: Thank you. But I wasn't
12 finished, then you can object.

13 Q. (By Ms. Lowry) That basically freezes the
14 hiring limits at the levels that they currently
15 existed as of the date of that memo, which is
16 December 20th, 2017.

17 MS. RACHAL: Same objection.

18 Q. (By Ms. Lowry) Now, at the time that
19 you -- sorry, withdraw that.

20 Do you know what the Legislative
21 appropriation was in FY 2017?

22 A. No.

23 Q. Okay. There was increased funding
24 provided for CPS in 2017. Just accept that as a
25 fact for the moment.

David Chandler 11/29/2018

1 A. It was what now?

2 Q. It was 34.5 million extra to CPS.

3 A. Yeah, I remember it -- they gave extra
4 money one year, yeah. Well, not extra, but more
5 than they had given in the past.

6 Q. What was the significance of that
7 increased funding?

8 A. Well, \$34 million kind of stands by
9 itself as far as being -- being significant.
10 That -- that was a -- a significant boost in the
11 budget, and I'm sure made a difference in the --
12 the ability of the agency to hire more folks, and
13 presumably if you hire more folks, you do better
14 work.

15 (Exhibit 18 marked for identification.)

16 Q. (By Ms. Lowry) I'd like to direct your
17 attention to the paragraph that's on the other
18 side of the page, and that's a statement by you
19 according to the newspaper, "We feel pretty good
20 about being able to attract the new people that we
21 need, but that's only a part of it. We must train
22 the new employees, Chandler told the committee.
23 One of our great concerns is putting a new
24 employee out in the field who is very well trained
25 and saddling that employee with an insurmountable

David Chandler 11/29/2018

1 caseload. We don't intend to do that."

2 A. That's right.

3 Q. And that was a quote from you. Is that
4 basically an accurate quote?

5 A. That's accurate.

6 Q. At that point, did you consider the
7 caseloads unmanageable?

8 A. Well, I -- I never considered any aspect
9 of the agency's responsibilities as unmanageable
10 or unachievable. You know, it would have been
11 against my nature to do that.

12 Q. Did you consider the caseloads too high?

13 A. Well, now, here's -- here's -- here's
14 the way I made my decisions pertaining to the
15 caseloads. I always asked Tracy if we could
16 achieve them.

17 Q. And what did you learn from Tracy?

18 A. Well, Tracy, if she had said no, we
19 can't do that, then I would have let Kenya know,
20 and she would have told you.

21 Q. But Tracy didn't say no?

22 A. I know, and specifically now, I don't
23 know where you're headed. Can I -- can I predict
24 where you're headed and answer the question before
25 you ask it?

David Chandler 11/29/2018

1 Q. You can say whatever you want in this
2 deposition.

3 MS. RACHAL: Counselor, please repeat
4 your question.

5 Q. (By Ms. Lowry) My question was, if Tracy
6 said that you couldn't -- I asked you whether you
7 thought the caseloads were unmanageable.

8 A. Yeah. And if Tracy said they were
9 manageable, I thought they were manageable.

10 Q. But she didn't say that; is that
11 correct?

12 A. I don't remember Tracy ever saying that.

13 Q. Okay. There has been reference to a
14 historic verbal agreement for DHS to provide SSBG
15 and TANF funds to CPS.

16 A. Yeah.

17 Q. Can you tell what that historic
18 agreement was, verbal agreement?

19 A. What -- a verbal agreement between John
20 Davis and me?

21 Q. Yes.

22 A. You know, I don't remember what it was
23 but now -- you know, let me -- here's the way that
24 thing worked while I was there.

25 Q. Good. Tell us.

David Chandler 11/29/2018

1 A. This is the way it worked. We were in
2 the business of making sure that every child in an
3 unsafe situation was identified, removed from that
4 situation and placed in a healthy situation, and
5 John Davis, I can tell you, was in the boat with
6 us always, committed. Now -- now, Kristi
7 sometimes would kind of raise the ire of his
8 deputies, Jacob Black, who's a fine young man and
9 knows -- knows government work extremely well, and
10 then the other young man, I can't remember his
11 name, but the way I know Jacob is, I grew up with
12 his daddy. He's -- he's a good fellow. He's from
13 good stock.

14 I could depend on John Davis and Jacob
15 Black, and -- and sometimes when Kristi would
16 maybe get Jacob aggravated, I would call John,
17 but -- but if -- if they were taking care of
18 business, I let them take care of business, you
19 know, and they always came up with the money. You
20 know, they -- money -- money was not anything that
21 we dwelled on, really. Really. Some -- sometimes
22 I think you might be gagging at a gnat -- gnat
23 while you're swallowing a camel, you know, if all
24 you do is look at the dollar amount and look at
25 the number. We didn't do that. I never did that,

David Chandler 11/29/2018

1 you know.

2 Q. Do you know why in fiscal year 2017
3 apparently the budget was submitted without any
4 TANF funds in the budget? Do you know why that
5 was?

6 A. When now?

7 Q. 2017, fiscal year 2017.

8 A. Before September the 15th?

9 Q. I don't know when it was submitted, but
10 it was for the fiscal year 2017 which runs from
11 2017 to 2018. I'm sorry, no, I was wrong. It's
12 2018.

13 A. Yeah. Well, evidently, that's the
14 budget that was submitted just -- just before I
15 left.

16 Q. That's right.

17 A. I figure. Let me tell you the way that
18 worked. That year -- the year prior to that, I
19 spent a lot of time with the Legislature telling
20 them what good folks they were because they were,
21 and how much I appreciated their help, because
22 they were helping.

23 And then the next year, I let Kristi
24 handle it all. I don't even -- I don't even
25 know -- I didn't go to the meetings at the

David Chandler 11/29/2018

1 governor's office or -- or anything, I don't
2 think. Kristi did all of that.

3 I think maybe I went to the
4 Legislature -- I remember going over there one
5 time that -- that second -- second year and -- and
6 meeting with the group who meets before you meet
7 with the budget group, and I don't know what group
8 that was, but I remember Senator Tollison was in
9 that group, and you know, he and I talked some.

10 We were friends, but whatever figure was
11 submitted, I will say without equivocation, it was
12 a figure that was sufficient for the agency to
13 meet its goals. Otherwise, the governor's office
14 and Kristi and Dr. Pugh would never have submitted
15 it.

16 Q. And that was the budget that was in
17 effect during the time -- at the point at which
18 you left the agency?

19 A. Yeah. I would say that. That's
20 probably right, yeah.

21 Q. Do you know that after you left the
22 agency, the incoming commissioner, several months
23 later, declared that there was a budget crisis?
24 Are you aware of that?

25 A. I -- I have heard that.

David Chandler 11/29/2018

1 Q. Yes. And, in your view, do you
2 understand what the basis for concluding there was
3 a budget crisis was?

4 A. No.

5 Q. There was some discussion in a memo from
6 Takesha Darby that suggests that money from DHS
7 would come in toward the end of the year. Were
8 you aware of that?

9 A. No. Takesha was -- you know, she was
10 the deputy in charge of finance, but if -- if she
11 said it, you know, it was accurate.

12 Oh, wait now, that memo, she sent it to
13 me?

14 Q. I'm going to show you that memo, and we
15 can --

16 A. Yeah.

17 Q. It's Exhibit 16.

18 A. She sent it to me?

19 Q. She sent it to Justice Dickinson?

20 A. Oh, well, that would be -- I don't --
21 you would have to ask them about that. Oh,
22 September the 15th, that's -- yeah, that's --
23 that's the day I left, I think.

24 That's probably the first day Jess was
25 formally in charge, I would guess maybe, on the

David Chandler 11/29/2018

1 15th. I may have that date wrong, but I think I
2 left September the 15th.

3 Q. All right. So what this memo says
4 toward the middle part of the memo, one, two,
5 three, four, five, in the fifth paragraph, it says
6 that, "While advocating for additional funds
7 during the Legislative session, CPS had not
8 anticipated any decreases in SSBG or TANF funding.
9 After the session ended, MDHS received an
10 appropriation bill which specifically outlined the
11 funds and positions appropriated to CPS separate
12 from MDHS.

13 "It was at this time Jacob Black and I
14 had a conversation regarding MDHS pulling back
15 TANF funding to allow CPS to realize its actual
16 budget, that TANF funds would be available at the
17 end of the year to prevent" -- "to prevent a
18 deficit for CPS. And then at the end" -- this is
19 the last sentence, "At the end of the year, CPS
20 received the \$12,300,702 from MDHS, and TANF
21 funding to close out the fiscal year."

22 Were you familiar with those facts?

23 MR. JONES: Do you mind clarifying if
24 that's fiscal year '17, Counselor?

25 MS. LOWRY: This is fiscal year '17.

David Chandler 11/29/2018

1 MR. JONES: Yes.

2 THE WITNESS: I'm not familiar with it,
3 but -- but again, now, let me tell you. I
4 really do want all of this to be in the
5 proper perspective. Here's -- here's the way
6 we worked. Here's the way we worked.

7 If that was what CPS needed, then I
8 never would say anything. If CPS needed
9 something different to that, I would call
10 John Davis, and I would say, John, we got
11 this memo from Takesha, but I want you to
12 know that this is what I think we actually
13 need or if -- if it was something that
14 offended him in the memo, I would apologize,
15 I would say you know, you and I are in this
16 thing together, and you know you can depend
17 on me. I know I can depend on you. And you
18 know that's the way it was handled, honestly.

19 Q. (By Ms. Lowry) And was there ever a time
20 when you had obligations under Olivia Y. that you
21 felt you couldn't meet because of funding?

22 A. No, no. But now, Marcia, again,
23 please -- please know, I didn't dwell on them
24 dollars. I didn't. It was -- I left that to the
25 deputies, and they handled it.

David Chandler 11/29/2018

1 Q. And did any of the deputies ever come to
2 you and say we can't meet a particular obligation
3 under Olivia Y. because we don't have, for
4 example, enough staffing?

5 A. Well, sometimes Kristi would come in,
6 and she would say we need more money or we can't
7 do this. And I would tell her, talk to Jacob and
8 the other young man there, but Jacob was the
9 fellow I knew over there, okay? And I would tell
10 Kristi, talk to Jacob. And usually they would get
11 it worked out.

12 And if they didn't, if she came back or
13 if, you know, Will knows this as well as I do,
14 Kristi was very direct. She did not mince words.
15 She did not waste one second, because she had a
16 lot to do.

17 And -- and Jacob, having grown up up
18 there in the rocky hills of Attala County, you
19 know, sometimes those -- those short, concise
20 little sentences, they -- they offend us, so
21 sometimes Jacob would get a little offended, and
22 then I would call John Davis, you know, honestly.

23 And John is as easygoing and as
24 knowledgeable and as capable as anyone, and as
25 trustworthy and as reliable as anyone I ever

David Chandler 11/29/2018

1 worked with. You know, I depended on him. I
2 could depend on him.

3 Q. Were you familiar with the specifics of
4 budget requests in the years that you were at
5 MDCPS?

6 A. Ask me that one more time. I should
7 have worn my hearing aids.

8 Q. I'm sorry, but I will speak more loudly
9 if that will help. Let me give you that last
10 question.

11 Were you familiar with specifics of
12 budget requests in the years you were at MDCPS?

13 A. Am I familiar with the specifics?

14 Q. The specifics. In other words, if I
15 asked you why you asked for this amount of money
16 as opposed to that amount of money?

17 A. No, no, don't ask me things like that, I
18 don't know.

19 Q. Okay. Who did know?

20 A. Well, the -- the first year there,
21 the -- the first year -- let me think about the
22 first year now. Oh, Takesha was there. Takesha
23 was there, and Takesha and Tracy, Kristi was not,
24 but Cindy, Cindy played a big role in that, and
25 then that other young lady, I can't think of her

David Chandler 11/29/2018

1 name, but Kristi replaced her.

2 That lady did a good job of
3 understanding the requirements of the agency and
4 putting a dollar amount on it. And so they --
5 they would go with me to the Legislature.

6 I always carried people with me who were
7 much more knowledgeable, much more capable than I.
8 And I would shake the Legislators' hands and tell
9 them what good folks they were.

10 And when they asked me a question, I'd
11 give the microphone to one of them, see. But now,
12 they knew every -- I -- I relied on them to know
13 every detail pertaining to the requests.

14 I don't remember the Legislators ever
15 asking us one question that our people did not
16 address directly, concisely, specifically and on
17 point.

18 Q. So the --

19 A. Wait, wait, wait. I've got to get up
20 now.

21 Q. Okay. Please do. You can go.

22 (Off the record.)

23 Q. (By Ms. Lowry) Are you able to continue
24 with the deposition?

25 A. Oh, sure. Here's what happens. I

David Chandler 11/29/2018

1 have -- I have peripheral neuropathy. I'll get a
2 sharp pain sometimes. I mean, it's not bad, and
3 it doesn't last three seconds, but it's --

4 (Off the record.)

5 Q. (By Ms. Lowry) So during the time you
6 were the commissioner, there were no budget
7 problems that you had, and the budget was
8 basically being handled by your deputies?

9 A. Yes.

10 Q. And things were moving along as well as
11 they could, but without any financial
12 difficulties; is that right? Is that correct?

13 A. Well, yes, and I think you would agree
14 with that. As a matter of fact, you did agree
15 with it. I saw it in the paper.

16 Q. Then it must be true.

17 A. Yeah.

18 Q. So how do you account for the fact that
19 following your retirement, the incoming CPS
20 director stated that MDCPS was facing a big
21 deficit?

22 A. I don't -- I don't know. Jess will
23 know, yeah.

24 Q. Are you aware that Commissioner
25 Dickinson has made the following statements about

David Chandler 11/29/2018

1 the 2018 deficit as related to your
2 administration?

3 MR. JONES: Is this another news article
4 or a document?

5 MS. LOWRY: It's a news article. It's
6 Exhibit 17.

7 Q. (By Ms. Lowry) This is quoted material, I
8 repeat, "I have no idea when those numbers came
9 from, Dickinson told the committee Tuesday." The
10 date on this article is January 10th, 2018. "I have
11 no idea how somebody suggested or predicted this.

12 I have asked everybody where those numbers
13 came from, and nobody has any idea where the numbers
14 came from. As far as I can tell, they're made up."

15 A. Yeah.

16 Q. Are you aware that Commissioner
17 Dickinson apparently, according to this article,
18 said that about the budget?

19 A. Well, that's what it says right there.

20 Q. Okay. Let me show you another article.
21 (Exhibit 19 marked for identification.)

22 THE WITNESS: Have you seen this? Nice
23 picture.

24 Q. (By Ms. Lowry) This article we have
25 marked as Exhibit 19. At the bottom of page 2, it

David Chandler 11/29/2018

1 says, "Dickinson has maintained that he discovered
2 the problems with CPS within weeks of taking the
3 agency reins, although he did not inform Legislators
4 until December. The previous administration at CPS
5 was either unaware of the issue or had not informed
6 lawmakers about the problem, he said."

7 Are you aware that Justice Dickinson
8 apparently said that?

9 MS. RACHAL: Objection.

10 THE WITNESS: Well, that's what the
11 words say.

12 Q. (By Ms. Lowry) Did Justice Dickinson call
13 you at any point after he took over the agency to
14 ask you what was going on?

15 A. Let's see now, I think I talked with
16 Jess, if I remember correctly, came to his office
17 two times after he assumed the Commissioner's job,
18 both -- both times at his request, and here's why.

19 I made it clear -- I thought I made it
20 clear, I said it clearly, I know that, I said
21 clearly to Jess, "Call me if you need me. I'll
22 help you any way I can." But I didn't impose, you
23 know, because he was the commissioner then, and I
24 didn't want to get in his way, and I didn't want
25 to cause any confusion about anything, but -- but

David Chandler 11/29/2018

1 if I remember correctly, he called me on two
2 occasions, and I went to his office, and we
3 talked.

4 Q. And about when were those occasions?

5 A. I don't know the time, but I would -- I
6 would guess sometime between September and
7 December, I'm guessing.

8 Q. And do you remember what those
9 conversations were about?

10 A. Well, the first time, as best I can
11 recall -- and Jess will remember this as well as
12 I, I know. But the first time we talked, Jess was
13 relaxed and seemed happy, and everything was going
14 reasonably well, and it was just kind of a general
15 conversation.

16 And then the second time, I don't know
17 how much time lapsed, honestly, I don't, but the
18 second time, Jess seemed overwhelmed by maybe the
19 responsibilities, the weight of the office.
20 That's the way I -- that's the way I viewed him.

21 He had a problem with his hip, and he
22 was limping, and he went back and forth from the
23 table in the office to his desk several times, and
24 I, frankly, felt sorry for him. And I also
25 remembered having that feeling that he seemed to

David Chandler 11/29/2018

1 be exhibiting a time or two after I was asked to
2 take the job but before I actually came to work.

3 You know, you look at all that stuff,
4 and it -- it can overwhelm you. But the
5 difference in me and the difference in Jess, see,
6 I had -- I had a longer period of time to think
7 about what a huge responsibility it was before
8 actually being saddled with it, because I -- I
9 took longer to study it, you know, and just learn
10 about it, learn about it, because I knew it was
11 going to be different.

12 I taught school a number of years, and
13 some years, I can't remember how many, but two or
14 three or four or five, I was the special
15 education -- I can't remember what they called it,
16 but I was in charge of the entire district's
17 special education teachers, and -- and, of course,
18 they were responsible for their students, not --
19 not only the low functioning, but the gifted and
20 those groups as well. And so I knew when you're
21 working with a group of people like that, there's
22 going to be emergencies, and -- and I kind of
23 viewed Jess as feeling that weight on his
24 shoulders, you know.

25 Q. And what -- do you recall how long you

David Chandler 11/29/2018

1 spent at the second meeting?

2 A. Well not too long, because I remember
3 specifically, he said, "I want to know about the
4 budget, and you're the only one who can help me."
5 And here's what I thought. I'm probably the least
6 likely guy who can help him about the budget. And
7 I thought -- I thought, you know, maybe he was --
8 he was focused on that too much because I -- I
9 didn't do that.

10 I let -- I let others who understood
11 governmental accounting and all of these federal
12 programs and the way they interact and intermesh,
13 I let others take care of that.

14 It would have overwhelmed me, and if I
15 had that to do over, rather than simply consoling
16 him, I would have -- I would have spoken more
17 directly and told him, you know, don't do that.
18 Let others.

19 If there were people there that he
20 trusted, and if there were not, he needed to get
21 them there. That's just my opinion. That's the
22 way I would have done it.

23 Q. Are you aware that shortly after he --
24 not shortly, but at some point after he took his
25 position he fired the person that you had had

David Chandler 11/29/2018

1 dealing with budget issues, Takesha Darby?

2 A. Well, now, I had heard. Now, it's
3 hearsay. I can't say it -- if I'm on the stand, I
4 hope I'm not, but I couldn't say it if I'm on the
5 stand. I can say it here. I heard -- I don't
6 remember who told me honestly I heard that --

7 MS. RACHAL: You're still under oath.

8 THE WITNESS: What?

9 MS. RACHAL: You're still under oath
10 here.

11 MS. LOWRY: I think the witness knows
12 that.

13 THE WITNESS: Yeah. I heard it. I'm
14 not sure I heard that he fired her. I -- I
15 heard that she left, I think. I can't
16 remember to be honest with you.

17 Q. (By Ms. Lowry) And how long had she
18 worked for you?

19 A. Well, she was the person I chose for
20 that position when I came on.

21 Q. And so you brought her into the agency?

22 A. No, she was already there.

23 Q. I see.

24 A. And she moved over.

25 Q. I see.

David Chandler 11/29/2018

1 A. But now, let me tell you one thing. I'm
2 going to brag on myself a little bit, all right.

3 I spent a good number of years, about
4 10, I spent 10 years or maybe more as a
5 psychometrist evaluating students' aptitude, their
6 potential, as well as their motivation and their
7 general behavior. I think I'm sort of good at
8 that.

9 And I had real good recommendations on
10 Takesha, and I would not recognize it now, but I
11 remember looking at her work experience,
12 background, and I knew I had to have someone who
13 understood that complex governmental accounting.
14 I thought it was Takesha, and I always thought
15 that, you know, the whole time I was there. She
16 never failed me as far as I know. She never
17 failed the agency as far as I know.

18 Now, here's one thing about Takesha, she
19 was -- she was a little standoffish. I think I
20 could tell her that. You know, she -- she was a
21 little closed, and frankly, I didn't meddle much
22 in the budget, because here's -- here's what I
23 didn't want to happen. I didn't want to give an
24 appearance, even to Takesha, but especially to
25 the -- to the media and the outside, that I was

David Chandler 11/29/2018

1 trying to influence the -- the budgetary decisions
2 in any way without going through the deputies who
3 were responsible for providing the services, like
4 Takesha and Cindy and Kristi.

5 You know, I didn't want to go around
6 them and go and talk to Takesha. I had one
7 cardinal principle. I would talk to anybody,
8 media, anybody, you, anybody who wanted to talk, I
9 would -- I would talk to them, but I also wanted
10 the other deputies there when I talked.

11 Q. Did you ever have any conversations with
12 Governor Bryant about this case?

13 A. Well, I'm sure we did. I don't remember
14 talking specifically, but -- but now, here's
15 what -- here's what -- I'm letting the cat out of
16 the bag a little bit here.

17 My plan was to exit the litigation,
18 Marcia. And -- and I think I made that clear to
19 the governor, maybe through Will, but -- but I
20 think the governor was expecting that. I intended
21 to do it.

22 Q. Expected to come into compliance with
23 the provisions?

24 A. Yeah, or close, close enough to get out
25 of the litigation. I thought we could do it.

David Chandler 11/29/2018

1 Q. And when did you expect to do that by?

2 A. Well, if -- if I had stayed through
3 December and everything had gone as it was going
4 while I was there, and it was some big report due
5 in December, I think, Tracy can tell you that
6 better than I, but December was the date I was
7 kind of looking at having everything in place to
8 ask Kenya to begin to get us out of the
9 litigation. I wanted to do it by the end of
10 Bryant's term. I wanted to be out by then.

11 Q. And how many -- I'm sorry, I'm not from
12 Mississippi. How long does he have until he is
13 term limited out?

14 A. His term ends next year.

15 Q. I see.

16 A. Next year. I still hope we can exit it
17 then, hope Jess and them can.

18 Q. Are you aware that Commissioner
19 Dickinson has moved to be relieved from a part of
20 the judgment with regard to caseload limits?

21 A. No.

22 Q. Are you aware that in another article --
23 that's number 19 --

24 MR. JONES: This is 18.

25 Q. (By Ms. Lowry) -- that Commissioner

David Chandler 11/29/2018

1 Dickinson says, according to something on page 3 of
2 the article --

3 MS. RACHAL: Counsel, could you please
4 state which exhibit? Sorry.

5 MS. LOWRY: I'm sorry. It is
6 Exhibit 19, and it is on page 3.

7 MR. JONES: Is this the same article?

8 MS. LOWRY: Uh-huh (affirmative
9 response) .

10 Q. (By Ms. Lowry) "But Dickinson said Monday
11 that the deficit has nothing to do with the
12 accusation of noncompliance. In fact, he said, the
13 agency wasn't on track to comply with the settlement
14 long before the deficit was uncovered, bolstering
15 claims he has made since January that the agency was
16 already in disarray when he came on-board last
17 fall."

18 So are you aware that Commissioner
19 Dickinson had said this in a newspaper article or
20 he's alleged to have said it in a newspaper article?

21 A. No. There again, we are two different
22 people, now, really. We both might -- might look
23 at a coon dog, and I'd see it as one I wanted to
24 own and could do a good job, and Jess -- Jess
25 might -- might not give a dime for that dog.

David Chandler 11/29/2018

1 Q. I'd like to also call your attention
2 to -- another article which we're going to mark as
3 Exhibit 20.

4 (Exhibit 20 marked for identification.)

5 Q. (By Ms. Lowry) I'd like to direct your
6 attention to page 5 of that article.

7 A. Nice picture of Tracy. Did you see
8 that?

9 Q. Okay. To the paragraph at the next --
10 second from the bottom of the page, starting in
11 April. And the paragraph says, "In April,
12 Dickinson told Mississippi Today that 'I have
13 nobody to be able to explain to me how this
14 happened.'

15 His guess, he said, was that the 2018
16 deficit was caused by the agency leadership's
17 attempt to get the Legislature to increase
18 spending authority for the new agency."
19 Continues, "They overrepresented expenses, he
20 said, they overrepresented revenues, but in an
21 attempt to arrive at a correct bottom line, which
22 they never did, Dickinson said in April." That's
23 what that said.

24 Do you agree with that statement?

25 A. Well, I agree with two words in it.

David Chandler 11/29/2018

1 Q. What are the two words?

2 A. "His guess."

3 Q. Okay. Did he ever ask you about any of
4 these things that he's quoted as saying in these
5 articles?

6 A. About what now?

7 Q. Did you -- did he ever ask you about
8 these things he's quoted as saying in these
9 articles?

10 A. What are the things?

11 Q. Well, there are several things that I
12 pointed out to you about the fact that there was
13 overrepresentation of expenses,
14 underrepresentation of income, that the
15 information appeared unclear, that the
16 organization was in disarray when he got there.

17 Did he ever say anything to you about
18 those things or say, hey, what a mess you left me
19 with or anything like that?

20 A. No, he -- he -- he never did. But now,
21 let me say this, and I'm not sure who will agree
22 with this, but I hope most would. I was proud and
23 remain proud of the good work we did while I was
24 there. But I can't take credit for much of it.

25 The people who made the agency what it

David Chandler 11/29/2018

1 was was Will Simpson, John Davis, Tracy Malone,
2 Takesha Darby, Kristi Plotner, Cindy Greer and
3 Seth Shannon.

4 All of those people, as a group, I'm
5 telling you now are much -- their sum is much
6 greater than their individual parts, and -- and I
7 mentioned earlier my experience at evaluating
8 folks' potential. It's more than aptitude.

9 You know, when you have a group of
10 people like that working together, there has to be
11 cohesion, and -- and that group, they -- they
12 referred to themselves, those deputies, as the
13 "Dream Team."

14 They were convinced that they did -- and
15 still are today. They were convinced, as I was,
16 that they were doing good work for the citizens of
17 this state looking after the children. And I was
18 convinced of that as well.

19 Q. And you know that at least the numbers
20 of that "Dream Team" from CPS, almost all of them
21 are now gone? Do you know that?

22 A. Well, I'm not sure who remains, but I
23 know some of them are gone.

24 Q. Certainly the -- most of the deputies
25 are gone, I think all but one.

David Chandler 11/29/2018

1 A. Takesha, Cindy, Tracy, Kristi, yeah.

2 Q. They're all gone. All right. You --

3 A. But now, Will and John Davis remain.

4 Q. Right. They don't work for CPS.

5 A. They don't work for them, but, you know,
6 I could -- I could see them putting the thing back
7 together, if -- if it's apart.

8 Q. You made a response to some of the
9 things that Jess Dickinson had said in Exhibit 19,
10 and you stated, "The governor had a liaison" --
11 where is that?

12 It's on page 4, and it says, "The
13 governor had a liaison who monitors all CPS
14 activities, including the preparation of the
15 budget. The liaison reports directly to the
16 governor. The budget was reviewed and approved by
17 the governor's office.

18 I have talked with every employee who
19 held a management position in my administration,
20 and they unanimously agree that during our entire
21 administration, one, we always met all the
22 requirements of the Federal Court order, and we
23 accomplished this within budget; two, at my
24 departure, we were confident that the foundation
25 we had established would enable CPS to continue

David Chandler 11/29/2018

1 meeting all the requirements of the Federal Court
2 order within the budget; three, despite all
3 challenges of the federal litigation, we made sure
4 every single day our focus was on the best
5 interest of every single Mississippi child."

6 Is that an accurate statement?

7 A. Yes; yes, that's accurate. I mean, you
8 know, I think it clearly stated the condition of
9 the agency. But now -- and I don't want to get
10 into a debate over this thing, but, you know, I
11 could have been wrong. I don't think I was.

12 MS. LOWRY: Okay. I think we'll take a
13 break.

14 (A short break was taken.)

15 MS. LOWRY: I have no further questions
16 for this witness.

17 EXAMINATION BY MS. RACHAL:

18 Q. I have just a few follow-up questions,
19 Justice Chandler.

20 Is it correct that you left the agency
21 approximately September 15th of 2017?

22 A. I think that's right. Now, honestly, I
23 could be wrong with that date, but I think it was
24 September the 15th.

25 Q. Is it correct that you have no personal

David Chandler 11/29/2018

1 knowledge of what occurred at the agency after you
2 left the agency?

3 A. Yes, absolutely, that's right. And let
4 me tell you, you know that one exhibit she took --
5 she showed me that, that memo from Takesha?

6 Q. Yes.

7 A. I noticed on the front page, it had
8 Commissioner Dickinson. On the second page, it
9 had David Chandler. So I think that's when the
10 transition took place.

11 Q. Okay. Is it correct that based on the
12 time that you left the agency, it was your belief
13 that there was sufficient funding available to
14 cover the needs of Olivia Y.?

15 A. Yes.

16 Q. And is it correct that you conveyed that
17 belief to Justice Dickinson?

18 A. Well -- well, now, here's what -- I
19 don't remember specifically saying, "Jess, there
20 are sufficient funds to meet the requirements of
21 Olivia Y." but -- but I certainly conveyed to Jess
22 my belief that funds were sufficient.

23 You know, here's what I may have said.
24 There -- there's plenty of money to do what you
25 need to do, but -- and -- and -- and, you know,

David Chandler 11/29/2018

1 plenty to me -- "plenty" to me because of my
2 rather meager upbringing as it relates to
3 finances, not as it relates to any -- anything
4 else, I consider myself a very fortunate person to
5 have grown up like I did with all of the benefits
6 that I had.

7 I had the benefit of working as the
8 janitor at our local bank beginning when I was in
9 the eighth grade, and I was fortunate enough to
10 have that benefit continue until I graduated from
11 high school.

12 And -- and along with that marvelous
13 opportunity came the benefit of walking to the
14 bank one mile every morning before school and
15 cleaning it up and then walking to school.

16 Think -- think of what a marvelous
17 opportunity I had as a child, along with my other
18 seven siblings, to -- to be brought up in a -- in
19 an environment, in an atmosphere like that, I was
20 fortunate.

21 But back then, in my entire life, plenty
22 of money to us might have been having a -- a
23 couple of dollars for the family or having a
24 quarter to eat in the lunch room cafeteria,
25 whereas someone else who grew up differently might

David Chandler 11/29/2018

1 look at that figure and think how deprived they
2 are.

3 So I always presumed, based on my
4 background and everything -- everything comes to a
5 person and is assimilated by that individual based
6 on his background and other factors, but based on
7 my background, I always presumed it was plenty of
8 money.

9 MS. RACHAL: I have no further
10 questions.

11 MS. LOWRY: I have nothing further. I
12 think the deposition is concluded.

13 MS. RACHAL: Thank you.

14 (Time Noted: 12:10 p.m.)

15 SIGNATURE/NOT WAIVED

16

17 ORIGINAL: MARCIA ROBINSON LOWRY, ESQ.

18 COPY: J. LAWRENCE JONES, ESQ.

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David Chandler 11/29/2018

1 CERTIFICATE OF DEPONENT
 2 DEPONENT: DAVID CHANDLER
 DATE: November 29, 2018
 3 CASE STYLE: OLIVIA Y., ET AL. vs. PHIL BRYANT, ET
 AL.
 4 ORIGINAL TO: MARCIA ROBINSON LOWRY, ESQ.

I, the above-named deponent in the
 5 deposition taken in the herein styled and numbered
 cause, certify that I have examined the deposition
 6 taken on the date above as to the correctness
 thereof, and that after reading said pages, I find
 7 them to contain a full and true transcript of the
 testimony as given by me.

8 Subject to those corrections listed
 below, if any, I find the transcript to be the
 9 correct testimony I gave at the aforestated time
 and place.

10	Page	Line	Comments
11	_____	_____	_____
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12	_____	_____	_____
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	_____	_____	_____

17
 18 This the ____ day of _____, 2018.
 19

 DAVID CHANDLER

20 State of Mississippi
 County of _____

21
 22 Subscribed and sworn to before me, this the
 ____ day of _____, 2018.

23 My Commission Expires:

24 _____
 25 _____
 Notary Public

David Chandler 11/29/2018

1 CERTIFICATE OF COURT REPORTER

2 I, Ginger H. Brooks, Court Reporter and
3 Notary Public, in and for the State of
4 Mississippi, hereby certify that the foregoing
5 contains a true and correct transcript of the
6 testimony of DAVID CHANDLER, as taken by me in the
7 aforementioned matter at the time and place
8 heretofore stated, as taken by stenotype and later
9 reduced to typewritten form under my supervision
10 by means of computer-aided transcription.

11 I further certify that under the
12 authority vested in me by the State of Mississippi
13 that the witness was placed under oath by me to
14 truthfully answer all questions in the matter.

15 I further certify that, to the best of
16 my knowledge, I am not in the employ of or related
17 to any party in this matter and have no interest,
18 monetary or otherwise, in the final outcome of
19 this matter.

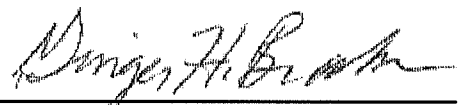
20 Witness my signature and seal this the
21 10th day of December, 2018.

22

23

24

25


GINGER H. BROOKS, #1165
CRR, RPR, CCR

My Commission Expires:
September 18, 2021